

6. CLOSURE SCHEDULE

Table 6-1 identifies the closure schedule that will be initiated following DEQ approval of this closure plan. This schedule reflects the time required for conducting closure activities and submitting information to the PE for certification.

IDAPA 58.01.05.009 (40 CFR 265.113) requires waste removal activities to be completed 90 days from the approval of the closure plan and closure to be completed within 180 days from the initiation of closure activities. An extension to these time periods is being requested at this time, pursuant to IDAPA 58.01.05.009 (40 CFR 265.113), to ensure that data of adequate quality are collected to demonstrate compliance with the closure performance standard. A 180-day extension to the 90-day hazardous waste removal period is requested at this time to protect worker health and to adequately perform waste removal and disposition activities. An extension to the 180-day closure period is also requested to protect human health and to adequately perform closure activities. Waste removal, treatment, and closure activities cannot be completed within these time frames due to several factors including, but not limited to, the following:

- The need to provide radiological contamination controls to prevent the spread of contamination
- The INL Site health and safety requirements for specific issues within the facility such as the need for fall protection, and working in confined spaces
- The time necessary for the analytical laboratories to complete analysis of samples and data validation, receive analytical results, and complete data quality assessment, as specified in the quality assurance project plan (DOE-ID 2004b) to determine if the closure performance standard has been met
- Complexities associated with removal and disposition of mixed wastes, including proper waste packaging, transport, and disposal issues.
- Treatment of the solids removed from the VES-SFE-106 tank system (described in Subsection 5.1) will require approximately 270 days to complete. Treatment will be conducted using a semicontinuous batch waste treatment process consisting of the following activities:
 - Solids will be slurried to containers
 - Samples of the waste stream will be collected and analyzed, as necessary, to confirm grout recipe
 - Grout will be added to the containers
 - The grout will be allowed to cure
 - A demonstration that the final waste form meets LDR treatment standards and the disposal facility waste acceptance criteria will be completed per the requirements of IDAPA 58.01.05.012 [40 CFR 268.7(a)(5)].

Table 6-1. Tank system closure schedule.

Activity	Subsection in Closure Plan	Completion
DEQ approval of closure plan		Day 0
Remove, treat, and dispose of wastes present in the VES-SFE-106 tank:	5.1	Day 270
<ul style="list-style-type: none"> • Mobilization of waste • Transfer of waste to treatment container • Stabilization of waste based on pre-determined grout "recipe" • Waste form sampling/characterization • Disposal of waste form based on characterization 		
Removal of VES-SFE-106 tank and associated piping and equipment located in the CPP-648 and CPP-603 buildings:	5.2	Day 540
	5.3	
<ul style="list-style-type: none"> • Removal of ancillary piping and equipment located within the tank vault, CPP-648, and CPP-603 • Removal of the tank • Disposal of piping and equipment based on characterization 		
Decontamination of associated piping and equipment that is to remain in place:	5.3	Day 690
<ul style="list-style-type: none"> • Integrity evaluation of piping • Decontamination of piping identified in Table 5-4 • Collection of closure certification samples, including laboratory analysis, data validation, and data quality assessment • Visual inspection of decontaminated piping 		
Removal of VES-SFE-106 vault:	5.2	Day 840
<ul style="list-style-type: none"> • Excavation of and removal of tank vault • Collection of soil samples, including laboratory analysis, data validation, and data summary report 		
Waste management activities complete:		Day 870
<ul style="list-style-type: none"> • Disposal of all closure-generated wastes 		
Closure activities complete		Day 900
PE and owner/operator certification submitted to DEQ		Day 960 ^a
a. If closure activities are completed ahead of the proposed schedule, the independent, Idaho-registered PE will submit the closure certification to DEQ within 60 days of the completion of closure activities. The subsequent approval from DEQ of the closure certification will be received within 60 days of this submittal.		

Quarterly reports summarizing closure activity progress will be submitted to the DEQ by April 30, July 31, October 31, and January 31 of each year for the previous quarter. Quarterly progress reporting to DEQ will commence on the first of the aforementioned dates following Day 0.

Quarterly reports summarizing client activity program will be submitted to the DBO by April 30, July 31, October 31, and January 31 of each year for the previous quarter. Quarterly program reporting to DBO will commence on the first of the aforementioned date following Day 0.